

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA,)	
Plaintiff,)	
)	
v.)	
)	Case No. 4:19-cv-00415
ALEXANDRU BITTNER,)	
Defendant.)	
_____)	

THIRD JOINT STIPULATION

Defendant Alexandru Bittner withdraws and waives his reasonable cause defense under 31 U.S.C. § 5321(a)(5)(B)(ii) regarding the 2011 FBAR penalty assessed against him for all purposes of this case, including upon any remand.

Plaintiff United States consents to Defendant Alexandru Bittner's withdrawal and waiver of his reasonable cause defense under 31 U.S.C. § 5321(a)(5)(B)(ii) regarding the 2011 FBAR penalty assessed against him for all purposes of this case, including upon any remand.

Respectfully submitted,

RICHARD E. ZUCKERMAN
Principal Deputy Assistant Attorney General

/s/ Herbert W. Linder
HERBERT W. LINDER
Ohio Bar No. 0065446
Attorneys, Tax Division
U.S. Department of Justice
717 N. Harwood St., Suite 400
Dallas, Texas 75201
Phone: (214) 880-9754/2432
Fax (214) 880-9741
herbert.w.linder@usdoj.gov

ATTORNEYS FOR UNITED STATES

/s/ Rachael Rubenstein
RACHAEL RUBENSTEIN
State Bar No. 24073919
CLARK HILL STRASBURGER
2301 Broadway St.
San Antonio, Texas 78215
Ph. (210) 250-6006
Fax (210) 258-2714
RRubenstein@clarkill.com

ATTORNEY FOR DEFENDANT
ALEXANDRU BITTNER

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that service of the foregoing stipulation has been made on
July 17, 2020, by the Clerk's ECF filing system to:

CLARK HILL STRASBURGER
Farley P. Katz
Rachael Rubenstein
2301 Broadway St.
San Antonio, Texas 78209

/s/ Herbert W. Linder
HERBERT W. LINDER